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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13

14 ARTHUR LEE ALFRED, II et al.,

15 Plaintiffs,

16 v.

17 WALT DISNEY PICTURES,

18 Defendant,
19

Case No. 2:18-CV-08074-CBM-ASx

DISCOVERY MOTION

DECLARATION OF JULIANA M. YEE IN OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL DISCOVERY

Judge: Hon. Alka Sagar

Hearing Date: April 19, 2022

Time: 10:00 a.m.

Place: Roybal Ctrm.
540

Pretrial Conf.: January 9, 2023

Trial Date: February 7, 2023

Discovery Cutoff: June 27, 2022

DECLARATION OF JULIANA M. YEE

I, Juliana M. Yee, hereby declare:

1. I am admitted to practice before all of the courts of the State of California and this Court. I am an attorney at the law firm of Munger, Tolles & Olson LLP and counsel of record for Defendant Walt Disney Pictures (“WDP”) in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, I could and would testify competently to the matters set forth herein

2. Attached hereto as **Exhibit A** is a correct copy of the Complaint in this action (Dkt. 1), filed with this Court on November 14, 2017.

3. Attached hereto as **Exhibit B** is a correct copy of the Screenplay attached to Plaintiffs’ First Amended Complaint as Exhibit 2 (Dkt. 112-2), filed with this Court on November 30, 2020.

4. Attached hereto as **Exhibit C** is a correct copy of the First Amended Complaint in this action (Dkt. 112), filed with this Court on November 30, 2020.

5. Attached hereto as **Exhibit D** is a correct copy of the Writers Guild of America (“WGA”) *Screen Credits Manual* produced by WDP in this action bearing control numbers WDP0054344 to WDP0054375.

6. Attached hereto as **Exhibit E** is a correct copy of a June 6, 2003 credit determination letter for *Pirates of the Caribbean: The Curse of the Black Pearl* from WGA to Stephanie Harris, Vice President of Credit and Title Administration at WDP, produced by WDP in this action bearing control numbers WDP0040408 to WDP0040409.

7. Attached hereto as **Exhibit F** is a correct copy of Plaintiffs’ Answers to Defendant’s First Set of Interrogatories served on February 17, 2022.

8. On February 16, 2022, and March 9, 2022, I participated in meet-and-confer calls with Plaintiffs’ counsel regarding, among other topics, Plaintiffs’ demand for financial information regarding the Sequels. During the February 16th

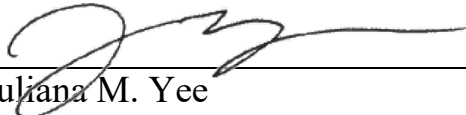
1 call, I asked Plaintiffs' counsel if Plaintiffs contended that the Sequels infringe their
2 Screenplay. Plaintiffs' counsel confirmed that they did not. We discussed
3 Plaintiffs' hypothetical license argument during both calls, but at no point did
4 Plaintiffs' counsel mention the *Red Hood* agreement as a basis for their hypothetical
5 license argument.

6 9. During the parties' meet and confers, Plaintiffs' counsel asked WDP to
7 produce financial information regarding the Sequels. WDP did not agree to this
8 proposal.

9 10. During the parties' meet and confers, Plaintiffs' counsel asked WDP to
10 produce financial information for *Curse* from 2003 to 2014, and offered to accept in
11 a summary format—a one-page overview of revenues, expenses, costs, and profits
12 on an annual basis—the financial information for *Curse*. WDP did not agree to this
13 proposal.

14 I declare under penalty of perjury under the laws of the United States of
15 America that the foregoing is true and correct.

16 Executed on this 22nd day of March, 2022, at Salt Lake City, Utah.

17
18 
19 Juliana M. Yee